

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

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**VERY REVEREND GEORGES F. de  
LAIRE, J.C.L.,**

**Plaintiff,**

**v.**

**GARY MICHAEL VORIS, ANITA  
CAREY, ST MICHAEL'S MEDIA AKA  
CHURCH MILITANT and MARC  
BALESTRIERI,**

**Defendants.**

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**Case No. 1:21-cv-00131-JL**

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**28 USC 1746 UNSWORN DECLARATION OF DEFENDANT MARC  
BALESTRIERI IN SUPPORT OF HIS RULE 60(b)(4) MOTION TO SET  
ASIDE DEFAULT AS VOID FOR LACK OF PERSONAL JURISDICTION**

I, Marc Balestrieri, make this declaration based on my personal knowledge.

1. At no time relevant to this lawsuit was I a citizen of New Hampshire. I have never owned any property in New Hampshire. I do not work in New Hampshire and do not reside in New Hampshire or otherwise have any continuous or systematic contact with the State of New Hampshire. I had no contact with the State of New Hampshire in connection with any of the allegedly defamatory comments. The articles were published by a third party on the Internet in the State of Michigan by the previously settled Defendants St Michaels Media aka Church Militant, Gary Voris or Anita Carey. I have no ability to post anything on that website or have any control over that website.
2. I had no connection with the April 15, 2019, video story that included interviews with people in New Hampshire. I did not conduct any interviews in New Hampshire

for the articles or video. I did not travel there for any video-taping. I do not have subscribers in New Hampshire. I do not reach out to New Hampshire citizens.

3. I am a solo practitioner canon lawyer whose disabled mother requires my care and financial support. I currently live, and have always lived, many hundreds of miles away from the State of New Hampshire, making the defense of a case hundreds of miles from my home and away from my very ill mother an extreme hardship.

*I declare under penalty of perjury that the forgoing is true and*

*correct.* Executed on this 18th day of February 2025.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Marc Balestrieri', written over a horizontal line.

Marc Balestrieri, *pro se*

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, in reply to the brief filed by Plaintiff Rev. Georges de Laire on 4 February 2025, my *Rule 60 (b)(4) Motion, Memorandum in Support, and Declaration* are filed in the U.S. District Court of New Hampshire before:

The Honorable Joseph N. LaPlante  
c/o Kellie Otis, Court Clerk  
U.S. District Court  
55 Pleasant Street  
Room 110,  
Concord, NH 03301-3941  
603-225-1423

I also certify that copies of the foregoing *Rule 60 (b)(4) Motion, Memorandum in Support, and Declaration* were posted today 18 February 2025 via FedEx Express to the following individuals:

*Counsel for the Plaintiff:*

Howard M. Cooper, *pro hac vice*  
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Dated : 18 February 2025



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Marc Balestrieri, *pro se*

DISTRICT OF NH

**FILED**

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24 HOUR DEPOSITORY